Atty. Dkt. No. 99PS014/KE (047141-0327)

REMARKS

Applicant respectfully requests reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow.

Claims 1-11 were previously cancelled. Claims 12-23 are being cancelled without prejudice.

Claims 24-43 are added. No new matter is added.

This amendment adds, changes and/or deletes claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier.

After amending the claims as set forth above, claims 24-43 are now pending in this application.

Although the Applicant disagrees with the Examiner's arguments, the Applicant has cancelled Claims 12-23 and have added Claims 24-43 to advance prosecution of the present application.

Applicant submits that the pending Claims recite subject matter that is patentable over the cited references.

Regarding Kondo, the Examiner has acknowledged that:

> "Kondo is silent on disclosing retrieving a system configuration of a passenger entertainment system, wherein the system configuration is retrievable upon activating the passenger entertainment system; identifying digital media stored in a digital media file server of the passenger entertainment, such that a programming database is generated, wherein the programming database is configured to assign multiple programming signals to the stored digital media, storing the

-8-

MILW_6267657.2

Atty. Dkt. No. 99PS014/KE (047141-0327)

program channel assignment information in the seat controller unit;
and displaying on the passenger control unit the program channel
corresponding to the programming signal, such that the passenger
control unit enables a user to toggle between program channels,
wherein the RF channels are configured to be mapped independent of
an equally distributive relationship with the programming signals,
wherein the passenger control unit is further configured to enable a
user to toggle between programming signals and to directly select a
particular programming signal"

Reed, alone or in combination with the other cited references, does not disclose the

combination of elements claimed in independent Claim 24 or independent Claim 34.

In particular, Reed does not disclose "reading the digital media files and program data of

the digital media files to identify viewable programs" or "generating an entry of channel

assignment information in a programming database for each identified viewable program." None

of the sections of Reed identified by the Examiner teach or suggest these activities. Column 19,

lines 27-47 (cited by the Examiner), discloses "a flexible data base capability for the cabin crew"

and further recites "[s]uch database capability can include for example information relating to the

crew, seat configurations, and passenger transaction data. This data base capability includes both

data compilation and data downloading onto a permanent storage medium." This section does

not mention "reading the digital media files and program data of the digital media files to identify

viewable programs" or "generating an entry of channel assignment information in a programming

database for each identified viewable program." Column 21, lines 57-63 (cited by the

Examiner), also does not disclose the claimed steps and in fact does not mention reading digital

media files, reading program data,, identifying viewable programs, or generating entries in a

programming database for identified viewable programs. Rather, Column 21 describes a

controller that receives video signals "and converts these signals into BFDM format" (line 59-

60). Column 25, lines 52-63 (cited by the Examiner), recites "[t]he VOD 34 can be configured

with an internal monitor to provide direct access to the disk arrays.... [w]hen the computer and

keyboard are connected to the server it has the ability to configure the server to its required

format, format each of the disk drives, reconstruct the disk drives as required, display error

-9-

statistics" and so on. The activities of Column 25 relate to general operational activities of a disk-based system and do not in any way disclose, teach or suggest "reading the digital media files and program data of the digital media files to identify viewable programs" or "generating an entry of channel assignment information in a programming database for each identified viewable program."

      The references cited by the Examiner are similarly deficient relative to other elements of the independent Claim 24. Even assuming, *arguendo*, that the cited references disclose one of "updating the programming database to assign a passenger control unit channel to each of the identified viewable programs" and "updating the programming database to assign at least one RF channel to each of the passenger control unit channels," Applicant respectfully submits that the cited references include no disclosure, suggestion, teaching or motivation for conducting both assignments via a programming database. Similarly, "using the seat controller and program channel assignment information of the programming database to: tune the seat controller unit to the proper RF channel for receiving the selected viewable program; and causing an identifier of the passenger control unit channel to be displayed," in combination with the other claimed elements, is not disclosed by the cited references. Rather, the cited references typically teach a system whereby a head unit (e.g., ESU 22 of Reed) conducts tuning and/or control activities – not a seat controller unit.

      Regarding dependent Claim 25, Reed does not disclose "sending program channel assignment information to memory in the seat controller unit, the program channel assignment information including the assignments of identified viewable programs to passenger control unit channels and the assignments of RF channels to passenger control unit channels". Column 14, lines 23-53 (cited by the Examiner) disclose "a dynamic table of the output to input connections and routing paths" in memory of the ESU 22 in the head unit of the aircraft. The routing table appears to relate more to hardware routing paths (see Reed, Figs. 6-10) than logical assignments of content and channels. Moreover, neither the head unit nor ESU 22 are "seat controller units".

MILW_6267657.2

Atty. Dkt. No. 99PS014/KE (047141-0327)

In contrast to the present Claims, Reed actually tends to teach away from storage of content and channel assignments in seat controllers and/or some amount of tuning or determining activity occurring at seat controllers. See Reed, Col. 18: "[a] key aspect of the present invention is removing all audio selection means such as tuners or switches from the passenger seat area. [t]hus, the VDB 18 merely accepts the video signal from the ESU 22 and routes it to the VDU 14. [i]n this sense, the VDB 18 is a video slave to the head unit, while the head unit ESU 22 and CCU 29 are video masters to the VDB 18."

Applicant believes that the present Claims (24-43) are neither anticipated nor obvious under the cited art and that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 18-1722. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 18-1722.
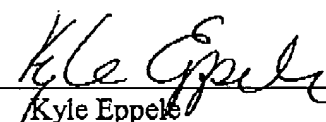
Respectfully submitted,

Date ___4/11/2008___   By ___Kyle Eppele___

Customer Number: 26383   Kyle Eppele
ROCKWELL COLLINS, INC.   Attorney for Applicant
400 Collins Road, NE   Registration No. 34,155
M/S 124-323
Cedar Rapids, IA 52498
Telephone: (319) 295-8280
Facsimile: (319) 295-8777

MILW_6267657.2